

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOUNTS TECHNOLOGIES LTD.,	:	
Plaintiff,	:	CASE NO. 2:23-cv-890
v.	:	
CONNECTIFY, INC. AND DOES 1-100,	:	Judge Mia Roberts Perez
Defendants.	:	
	:	

**MOTION OF DEFENDANT, CONNECTIFY, INC.,
TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendant, Connectify, Inc. (“Connectify”), by and through its counsel, Stradley Ronon Stevens & Young, LLP, moves for dismissal with prejudice of Plaintiff’s Second Amended Complaint [Dkt. No. 26] pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted because the claims of U.S. Patent No. 9,258,309 fail to recite patent-eligible subject matter and are invalid under 35 U.S.C. § 101.

In support of this Motion, Connectify incorporates its accompanying Memorandum of Law. A proposed Order is attached.

Respectfully submitted,

/s/ Samantha B. Kats

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Dated: February 24, 2025